

LOL-HECO-IR-59

Ref: Expert Qualifications of HECO Witness Stewart, (HECO-500)

Question(s):

- a. Over the course of your career, how many utility operations have you analyzed?
- b. How many times did you find that the approach by the utility was incorrect?
- c. How many of those analyses did you find that the utility had done something significantly wrong?
- d. Please provide copies of the three reports you wrote that are the strongest cases for the fact that you can look at your employer from an objective viewpoint.

HECO Response:

- a. HECO objects to the request which asks “how many utility operations have you analyzed?”

The request is vague and ambiguous as it does not identify what the term “utility operations” means. The term “utility operations” could be construed in a number of ways, such as meaning entities (i.e., how many utilities have you analyzed) or operational practices (i.e., how many utility operational practices have you analyzed). Without waiving any objections, HECO provides the following response. For purposes of this response, we construed the term “utility operations” to mean inspection, maintenance, design, construction, procurement and operating practices for overhead lines. Mr. Stewart has analyzed on the order of 100 “utility operations”

- b. See the response to subpart c.
- c. Occasionally, Mr. Stewart found some aspect of an overall process being done incorrectly. Seldom, however, did Mr. Stewart find a systemic/pervasive or significant incorrectness associated with a practice. This is in part due to the conservative and prudent nature of electric utility operations. The one exception to this might be the occasional utility whose

- budgets for maintenance have been so drastically cut year in and year out that they have done little to no system maintenance, other than responding to failures or imminent failures.
- d. The results of all audits/assessments of utility practices that Mr. Stewart has conducted for specific utilities are subject to contractual confidentiality clauses and, therefore, are not available. Please note that one of the reports prepared by Mr. Stewart was for Electric Power Research Institute, Inc. (EPRI). The report is titled "Assessment and Inspection Methods (AIM) Field Experiment – Volume 1: Results of Transmission Line Inspection Experiment, Project 3621-01, EPRI TR-104449-V1, May 1995".

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